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March 27, 2003

ELECTRONICALLY FILED

The Honorable Andre M. Davis
United States District Court for
the District of Maryland
Garmatz Federal Courthouse
101 W. Lombard Street
Baltimore, Maryland 21201

Re: Jennifer Mazzarello v. Lucent Technologies, Inc.,
Civil Action Number AMD 02 CV 3576

Dear Judge Davis:

Please accept this correspondence as the Joint Status Report of the parties in the above captioned matter in accordance with your November 12, 2002 Scheduling Order.

1. Status of Discovery: The parties have completed all written discovery in this matter. As the Court may recall, the parties had filed a Joint Motion to Consolidate this matter with the case of Lisa Bryan v. Lucent Technologies, Civil Action Number AMD-03-0265, which Motion was denied by the Court. The parties have since endeavored to conduct joint depositions for both Ms. Mazzarello's and, to the extent applicable, Ms. Bryan's cases. As of today's date, seven depositions have been completed. Despite the best efforts of the parties and counsel, however, there remain several depositions which are not yet completed. These are as follows:

a. Lisa Bryan: Defendant commenced Ms. Bryan's deposition on March 21, 2003, but was unable to complete her deposition that day. Due to the scheduling of other depositions in this case, as well as the schedules of counsel with regard to other matters, Ms. Bryan's deposition could not be scheduled to resume until after the current March 27, 2003 close of discovery in this action.

b. Laraine Scarpon: Ms. Scarpon is a former employee of Lucent who resides in Newark, New Jersey. Ms. Scarpon had been scheduled to appear for deposition on March 26, 2003, in Camden, New Jersey, but advised counsel for Lucent late last week that she was unable to appear due to the sickness of her father and her inability to travel to Camden. Counsel for the parties have agreed to reschedule the deposition for Ms. Scarpon at a location more convenient to her, but were unable to do so in the time before the close of discovery currently scheduled in this matter.

c. Dawn Dugan: Ms. Dugan, a current employee of Lucent who resides in Irving, Texas, had been scheduled to appear for a video deposition on March 27, 2003.

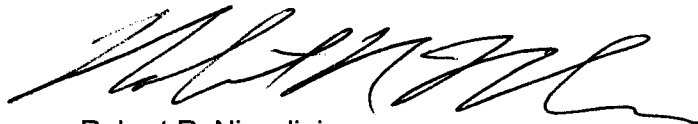
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Unfortunately, Ms. Dugan notified counsel for Defendant on March 21, 2003 that she would be unable to appear for deposition due to an unavoidable business scheduling conflict. Counsel were not able to reschedule Ms. Dugan's deposition before the currently scheduled close of discovery in this matter.

2. Pending Motions: There are no motions pending at this time.
3. Intent to File Dispositive Motions: Plaintiff does not intend to file a dispositive motion in this matter, but Defendant will file a Motion for Summary Judgment once discovery is completed.
4. Trial By Jury and Anticipated Length of Trial: Plaintiff respectfully requests that this matter be tried by jury. Plaintiff anticipates that the trial in this matter will last approximately seven days. Defendant anticipates that trial should take no more than 4-5 days.
5. Settlement Negotiations: The parties have engaged in good faith settlement negotiations in this matter, but have thus far been unable to resolve this matter.
6. Settlement Conference/ADR: Plaintiff believes that it would be helpful to submit this case to a Settlement Judge. Given the failure of settlement negotiations to this point, however, Defendant believes that such a referral would be better considered after the Court's ruling on summary judgment.
7. Magistrate Judge: The parties do not consent to having a Magistrate Judge preside over the trial of this matter.
8. Other Matters: As already indicated, several depositions have not been taken or completed, despite counsel's best efforts to do so. Counsel therefore jointly request at this time an extension of the discovery deadline by thirty (30) days, to and including April 28th, for the limited purposes of taking the depositions of Laraine Scarpon and Dawn Dugan, as well as the potential completion of the deposition of Lisa Bryan. Accordingly, counsel further request a 30-day extension of the deadline in which parties may file dispositive motions in this matter, up to and including May 28, 2003. The parties have no further matters to be brought before the Court at this time.

At the convenience of the Court, please advise whether discovery and the dispositive motions deadline may be extended in this matter. Thank you for your consideration.

Sincerely,



Robert R. Niccolini

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cc: Paul V. Bennett, Esq.